



TWesner@aol.com
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To: CWAwaters@EPA
cc: BellLiberty@aol.com
Subject: Docket ID No. OW-2002-0050

The Clean Water Act should apply to ALL waters of the United States

For 30 years, the Clean Water Act has played an essential role in protecting and restoring our nation's waterways. This progress would not have been possible if the Act had not applied to ALL of our nation's waters.

Clean water is essential for drinking, for recreational, industrial, commercial, and agricultural uses, and for aquatic life and wildlife.

A more restrictive definition of the waters subject to the Clean Water Act ("waters of the US) would be **detrimental to the health, safety, and welfare** of your local community and environment because: **scientific studies repeatedly show the interconnectedness of surface waters, wetlands, and groundwater. Therefore, adequate protection of navigable waters relies on protection of nonnavigable tributaries and adjacent wetlands.**

Isolated wetlands provide essential groundwater recharge services. In recent years, Southeastern Michigan aquifer levels have been declining, negatively affecting the amount of water available for residential, commercial and industrial use.

Smaller, isolated wetlands have been shown to provide as many ecological services to the Huron River Watershed as larger wetlands contiguous to waterbodies; and flood control is dependent on proper management of the entire watershed draining to the Huron River.

Enforcement of water protection for isolated, ephemeral, nonnavigable or adjacent waterbodies at the state level, without federal support under the Clean Water Act, would be inadequate because: enforcement by the state of Michigan of existing water protection programs is underfunded and regularly inadequate; and without the leverage provided by Clean Water Act requirements, state compliance with water protection rules would be much less likely to occur.

The notion that protection of waters under the CWA should be determined by their relevance to interstate commerce is an insufficient basis for working toward the Act's ultimate objective **"to restore and maintain the chemical, physical, and biological integrity of the Nation's waters."** Restoring and maintaining our Nation's waters should be first and foremost grounded in the best available scientific data and research.

The bottom line: the definition of US waters subject to the Clean Water Act should include, in addition to traditionally navigable waters, all nonnavigable tributaries, intermittent and ephemeral streams, waters that pass through man-made conveyances, and all wetlands whether or not there is a visible connection to surface waters.

Respectfully submitted,

Terry Wesner
Vice-Chairperson Lima Township Planning Commission